## **REMARKS**

Reconsideration of this application, as amended, is requested.

Claims 1-8 and 11-15 remain in the application. Non-elected claims 9 and 10 have been cancelled without prejudice and may be prosecuted in a divisional application. Each of the remaining claims has been amended to eliminate the numeric references that had been in the original claims. Numeric references are not required under U.S. patent law and are given no patentable weight. Accordingly, the elimination of numeric references is not a narrowing amendment and is not an amendment entered for purposes of patentability. Additionally, independent claims 1 and 11 have been amended to define the invention more clearly. Claim 13 also has been amended to correct the originally intended dependency.

Claims 1-8 and 11-15 were rejected under 35 USC 103(a) as being obvious over Adlon et al.

The Adlon et al. reference is directed to an apparatus for connecting a connector to a flat cable. The apparatus functions by positioning the flat cable between the main body 10 of the connector and the cover 12 of the connector. The apparatus then moves the cover 12 and the main body 10 toward one another so that insulation piercing terminal fittings in the main body pierce through the wires of the flat cable and make electrical connection with the cores of the respective wires. Simultaneously, the cover 12 is engaged with the main body 10 so that the end of the flat cable 26 is sandwiched between the main body 10 and the cover 12. The apparatus shown in Adlon et al. performs this exact same operation sequentially at opposite ends of the flat cable as the flat cable is being advanced longitudinally along the length of the flat cable. After completing the downstream termination of one cable and the upstream termination of

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another cable, the apparatus of Adlon et al. cuts portions of the flat cable between the two terminations.

The subject application explains that the Adlon et al. type of apparatus works well when there are a relatively small number of wires to be terminated (see paragraph 0007). However, paragraph 0007 explains that connectors with a large number of terminal fittings for connection to a corresponding number of wires cannot be connected merely by urging the cover down onto the wires to push the wires into the insulation-displacement terminal fittings. In this regard, both the cover and the base are formed from a plastic material that is intentionally designed to be as small as possible. The large forces required to effect termination for a large connector may exceed the magnitude of forces that can be exerted efficiently through the plastic cover. The Adlon et al. apparatus has absolutely no suggestion of a wire pushing device for directly contacting and pushing the wires mounted in the housing on the pressure-receiving table into the insulation-displacement terminal mounted in the housing. Adlon et al. also has absolutely no suggestion of a drive control means for controllably driving the press unit and controllably translating the connection-assisting parts transverse to the push axis of the wires so as to sequentially press the wire pushing device and the cover holder.

In contrast, the invention defined by amended claim 1 now positively recites a wire pushing device for directly contacting and pushing the wires mounted in the housing on the pressure-receiving table. This wire pushing device is defined as being structurally and functionally independent of the cover holder for holding the cover of the insulation-displacement connector and for mounting the cover on the housing after the wires are pushed into the insulation-displacement terminal. The invention defined by amended claim 1 further defines the driving control means for controllably moving the connection-assisting parts transverse to the pushing axis and driving the press unit so as to sequentially press

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the wire pushing device and the cover holder. The Adlon et al. reference would have to be redesigned completely to bring that reference closer to the invention defined by amended independent claim 1 or amended independent claim 11 and their respective dependent claims. Accordingly, it is submitted that the invention defined by the amended claims is directed to patentable subject matter, and allowance is solicited. The Examiner is urged to contact applicants attorney at the number below to expedite the prosecution of this application.

Respectfully submitted,

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